

# EXHIBIT A

**FILED**

(4) JAN 13 2021

TRISTEN WORTHEN  
DOUGLAS COUNTY CLERK  
WATERVILLE, WA

BY \_\_\_\_\_ DEPUTY

*Wj*

IN THE SUPERIOR COURT OF THE STATE OF WASHINGTON  
IN AND FOR THE COUNTY OF DOUGLAS

JANET MURPHY,

Plaintiff,

v.

HOBBY LOBBY STORES, INC., an  
Oklahoma corporation, d/b/a, and HOBBY  
LOBBY STORES, INC. STORE #0528,

Defendants.

No. 21-2-00007-09

COMPLAINT

Plaintiff Janet Murphy, for cause of action against Defendants Hobby Lobby Stores, Inc.,  
d/b/a, and, Hobby Lobby Stores, Inc. Store #0528, alleges and states as follows:

**I. JURISDICTION**

1.1 The incident complained of occurred in East Wenatchee, Douglas County,  
Washington.

**II. PARTIES**

2.1 Plaintiff. Janet Murphy (Murphy) was at all times material hereto a resident of  
Wenatchee, Chelan County, Washington.

COMPLAINT

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**LACY KANE & KUBE**

300 Eastmont Avenue  
East Wenatchee, WA 98802  
(509) 884-9541 ♦ FAX: (509) 884-4805

- 3.1 Hobby is a retail store located at 10 Grant Road, in East Wenatchee, Washington.
- 3.2 On or about January 22, 2018, Murphy drove to Hobby to shop.
- 3.3 Ice was present on the walkway of Hobby's entrance.
- 3.4 No warning or caution signs were present.
- 3.5 Murphy slipped and fell on the ice while attempting to exit Hobby, sustaining severe injuries.

3.6 On or about January 25, 2018, Murphy filed a claim with Hobby for her injuries suffered because of the fall.

- 4.1 Murphy restates and realleges all prior paragraphs.
- 4.2 Hobby owed Murphy a duty of care to ensure their entryway was safe to walk on.
- 4.3 Hobby failed to ensure the entryway was safe to walk on, causing Murphy's fall and ensuing injuries.
- 4.4 Hobby owed Murphy a duty of care to protect her from dangers it would expect Murphy would not discover or realize, or dangers from which it would expect Murphy to fail to protect herself against.

1 4.5 The slippery walkway presented such a danger or condition, which posed an  
2 unreasonable risk.

3 4.6 Hobby failed to exercise reasonable care to protect Murphy from such danger, to  
4 make the condition safe, or to warn Murphy of the danger.  
5


6 **V. DAMAGES AND CAUSATION**

7 As the direct and proximate result of the negligence of Hobby as stated above, Murphy  
8 sustained personal injuries, including special and general damages, as shall be proven at trial.  
9


10 **VI. REQUEST FOR RELIEF**

11 Murphy requests that the Court grant the following relief:

- 12 1. For judgment against Hobby for damages as set forth in the preceding paragraphs  
13 in such amounts as shall be proven at trial, including Murphy's costs and  
14 disbursements expended herein; and  
15 2. Such other and further relief as the Court shall deem just and equitable.  
16

17   
18 DATED this \_\_\_\_\_ day of January, 2021.

19 LACY KANE & KUBE, P.S.

20   
21 By: \_\_\_\_\_  
22 COREY M. KANE, WSBA No. 49710  
23 Attorney for Plaintiff  
24  
25  
26  
27  
28



**CERTIFICATION BY PLAINTIFF**

I am the Plaintiff in the above-captioned matter; I have read the within and foregoing Complaint, know the contents thereof, and believe the same to be true.

  
JANET MURPHY

